

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GRIDDY ENERGY LLC,	)	Case No. 21-30923
	)	
Debtor.	)	(Jointly Administered )
	)	

**STIPULATION BETWEEN ERCOT AND CLASS ACTION CREDITORS**

Creditor Lisa Khoury and the proposed class action creditors (“Class Action Creditors”), and the Electric Reliability Council of Texas, Inc. (“ERCOT” and together with the Class Action Creditors, the “Parties”) enter into this stipulation (the “Stipulation”) and agree as follows:

1. On April 1, 2021, the Class Action Creditors served ERCOT with a Notice of Subpoena (the “Subpoena”) requesting the production of documents pursuant to FED. R. BANKR. P. 2004.
2. On April 9, 2021 the Parties stipulated and agreed that the deadline for ERCOT to object, move for a protective order, or otherwise respond to the Subpoena shall be May 3, 2021.
3. The Parties now stipulate and agree that the deadline for ERCOT to object, move for a protective order, or otherwise respond to the Subpoena shall be extended to May 17, 2021.
4. The Stipulation is intended by the Parties to be binding upon their successors, agents, assigns, including bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.
5. The Bankruptcy Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation.

**STIPULATED AND AGREED TO THIS 30<sup>TH</sup> DAY OF APRIL, 2021:**

**THE POTTS LAW FIRM, LLP**

By: /s/ Derek H. Potts  
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**ATTORNEYS FOR CLASS  
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RELIABILITY COUNCIL OF TEXAS,  
INC.**